September 07, 1999

State Water Resources Control Board
P.O. Box 944213
Sacramento, California 94244-2130

Attn: Mr. Todd Thompson

According to the Executive Summary of the Draft Environmental Impact Report received from your office, the Antelope Valley area, by not including it in the General Order Exclusive Area, is a permissible area to land spread Biosolids - a nice word for human sewage. 39-1

While the Antelope Valley does not have a river running through it or a lake to protect, like Tahoe or Mono, the residents do pump water from a lake under the valley. This is the Antelope Valley Aquifer. All rural area residents are totally dependent on well water pumped from this aquifer. Both cities, Lancaster and Palmdale pump well water to blend with water available to them from the California Aqueduct. This well water is pumped from a closed aquifer - no outlet to drain or filter away contaminates. For those of you in Sacramento, whose job it is to protect water resources, to allow Class B Human Sewage to be trucked into this Antelope Valley to be land spread and endanger this water supply, is pure stupidity. 39-2

If you will investigate the sewage treatment facilities in the Southern California area, you will find that not one produces Class A Biosolids. 39-3 As the Antelope Valley is only 75 miles from the Los Angeles Hyperion Sewage Treatment Facility and is the only open area within 75-100 miles, it would be the cheapest haul for this bacteria/virus laden sewage. 39-4 Enclosed are two news articles from the Los Angeles Times, dated, 09-05-99, reporting the Beach Cities problems with human sewage contaminating the waters from Huntington Beach to Malibu and the resulting viruses and microbes found there. While the Antelope Valley doesn't have "open" water to contaminate, bringing in hundreds of truck and trailer loads of sewage and dumping it above ground, will pollute just as surely, the underground water supply with the same pollutants that are affecting the Beach Cities (agents causing diarrhea and hepatitis to the common cold). 39-5

Additionally, the Antelope Valley is known for its high wind velocities, often exceeding 50 miles an hour. Dump this sewage on the ground and it will be dried in a day to pollute the air. The cities of Lancaster and Palmdale each have built large soccer complexes for league play. The small community of Antelope Acres, with no city or county funding, just completed a baseball, basketball, soccer facility for the youth of the area. Have these been built to make our children ill by encouraging them to play outside and breathe contaminated air? 39-6 (cont) 39-7

Your board has the responsibility to protect the water and air of all of California, and should do so by adding the Antelope Valley in the General Order Exclusion Areas for land spreading Biosolids. If the dumping of biowaste is not safe for the waters off the shores of Southern California, then it is certainly not safe to spread on the open fields of Southern California. 39-8

Sincerely,

John Cade
Noreen A Cade

John and Noreen Cade
9348 West Avenue I
Lancaster, California 93536

Los A

ON THE INTERNET: WWW.LATIMES.COM
CIRCULATION: 1,098,347 DAILY / 1,385,787 SUNDAY

SUNDAY REPORT

New Tests Show Human Viruses in Beach Waters

■ Southern California's costly program to sample beaches is failing to detect microbes most likely to sicken people. A solution to the problem remains elusive.

By MARLA CONE
TIMES ENVIRONMENTAL WRITER

Scientists wielding sophisticated new genetic tests have discovered that Southern California beach waters are incubators for human viruses with the potential to make swimmers sick with ailments from diarrhea to hepatitis to the common cold.

Because enteric viruses—which cause diseases of the intestinal or respiratory tract—are spread only by people, finding them in the water proves that human sewage is still routinely flowing into the ocean despite the billions of dollars the region has invested in massive treatment plants.

Viruses are being carried to the beaches by urban runoff, the voluminous waste that spills into gutters from streets, yards and parking lots and flows straight to the ocean via storm channels. Unregulated and unmonitored, the viruses are showing up at many beaches year-round, even in waters that meet state and federal health standards.

The discovery shows that Southern California's costly program to sample beaches, often on a daily basis, is failing to detect the microbes most likely to sicken people. Beach-sampling programs test only for bacteria—an unreliable way to look for human waste—because public health agencies have not yet found cheap and reliable ways of finding viruses in seawater.

For several years, officials have been giving Southern Californians advice about avoiding urban runoff and staying healthy in the water: Don't swim near storm drains, they say, even in dry weather. After rains, avoid all ocean waters for several days.

The detection of human viruses at beaches does not change that advice—for now. But the risk of contracting an infectious disease is almost certain to increase as Southern California's population grows unless steps are taken to reduce the waste that flows into storm drains from streets and yards.

For part of this summer, officials closed nearly all Huntington Beach waters in Orange County after finding mysteriously high bacteria counts that may be due to runoff.

Urban runoff—one of the few U.S. environmental problems still getting worse—is the nation's No. 1 source of pollution fouling waterways. And experts believe that the Los Angeles region has the most severe problem in the nation, with residues of city life routinely spreading out to sea.

The volume of contaminated runoff reaching Southern California's coast, from Ventura to the Mexican border, has swelled roughly twelvefold since 1972, according to the Southern California Coastal Water Research Project, a scientific institute funded by the federal government and county sanitation agencies.

Back then, about 65 billion gallons of runoff poured yearly into the region's 13 largest creeks and rivers

Please see VIRUS, A14

DOWN THE DRAIN
Urban Runoff Fouls Southern California Beaches
■ First in a two-part series

Plenty of Room

Despite assurances of safe water, crowds on the sand in Huntington Beach are half the usual size. B1

A Sewerless Malibu May Be Fouling Its Own Beaches

By MARLA CONE
TIMES ENVIRONMENTAL WRITER

Home to movie stars and other millionaires, Malibu seems to be the perfect spot to escape urban ills. It's so close, yet so far.

But urban runoff and perhaps sewage leaking from nearby multimillion-dollar homes have turned Surfrider Beach at Malibu Lagoon State Beach into one of the unhealthiest strips of sand in the United States. This famous, picture-perfect beach often flunks its bacteria tests. Tests last year found giardia and cryptosporidium—pathogens from human or animal waste that can cause gastrointestinal disease—in the Malibu surf.

Placards prominently posted on the beach proclaim in two languages: "Warning! Storm Drain Water May Cause Illness. No Swimming." But people routinely ignore the warnings. On one recent sunny day, one surfer found a valuable use for one of the signs—she leaned her surfboard on it as she rested.

Children and parents with toddlers also gravitate to this beach, which welcomes more than a million visitors a year. Towering, perfectly shaped waves roll for hundreds of yards through the iodescolored water, and the sand looks so clean it sparkles. But the illusion vanishes if you turn your back to the ocean and take a close look at the lagoon on the other side of the strand. It brims with runoff carried by Malibu Creek from the streets and yards of 110 square miles of Los Angeles and Ventura counties. The polluted water drains straight to Surfrider Beach.

Malibu itself could be contributing bacteria from its toilets. The city, prizing its isolation and restricted growth, has refused to tie into county sewers. Instead, all property owners have underground septic systems where waste is supposed to decompose.

Water quality officials say septic tanks are usually acceptable in rural areas but are questionable in a city of 12,000 people like Malibu.

"Some of them are right on the beach, so you have a direct pathway to the beach," said Dennis Dickerson, executive officer of the Los Angeles Regional Water Quality Control Board.

After refusing for years, the Malibu City Council, under an order by the water board, reluctantly mounted a project in July to see if the tanks are leaking bacteria onto Surfrider Beach. Some results could be ready this year.

City Council members blame runoff from inland areas and insist that they will never hook up to the county sewer system—a step they fear would prompt more residential or commercial development.

Meanwhile, at the beach, it's not unusual to count 200 surfers in the water even midweek. Some don't believe the health warnings; others think their sport is well worth the risk, even as they trade stories of surfers who have become ill.

"This is probably the most famous surfing beach in the world," said Dr. Gordon LaBerge, a physician and environmental activist. It is also, he said, "one o the dirtiest."

VIRUS: New Tests Show Dangerous Microbes in Surf

Responses to Comments from John and Noreen Cade

39-1. The commenter is correct that land application of biosolids, as long as the provisions and prohibitions of the GO are met, could occur in the Antelope Valley.

39-2. SWRCB staff respectfully disagrees with the implication in the comment that the EIR is inadequate and that biosolids application projects under the GO would not protect water quality in the Antelope Valley aquifer. Master Responses 13, 14, and 15 generally describe the basis for the analysis of potential groundwater quality impacts in the EIR with respect to EPA's risk assessments conducted for the Part 503 regulations, additional protective measures included in the GO, and the authority of RWQCB staff to use monitoring and professional judgment to determine whether a specific biosolids application project would preserve water quality.

39-3. The commenter's statement that treatment facilities in southern California do not produce Class A biosolids is incorrect. County Sanitation Districts of Los Angeles County and Riverside produce Class A biosolids. Additionally, several other wastewater districts in southern California take their biosolids to composting facilities where Class A biosolids are produced. In fact, large quantities of composted biosolids are produced in southern California.

39-4. The commenter provided articles from the Los Angeles Times, dated September 5, 1999, reporting the Beach Cities problems with human sewage contaminating the waters from Huntington Beach to Malibu and the resulting viruses and microbes found there. The beach closures that occurred were not a result of human sewage as previously reported. They were the result of a combination of factors, predominantly urban runoff. A broken sewer line was suspected of being the source, but this was found not to be the case. Contaminated outflow with high bacterial counts from a coastal wetland into which urban runoff flows is a suspected source of the high onshore bacterial counts. Flocks of birds on the beach also have been shown to contribute to high shoreline bacterial counts (Barnett pers. comm.). These issues are not relevant to the conclusions presented in the draft EIR on the land application of biosolids.

39-5. See Response to Comment 39-2.

39-6. All biosolids transferred to arid areas for tilling into the soil would be required to be incorporated into the soil within 24 hours of application. Also see Master Response 9 on wind-blown dust.

39-7. The commenter is concerned that children and the ill will breathe contaminated air resulting from the land application of biosolids. There has been some local controversy surrounding a sludge composting facility in the Antelope Valley. The GO contains provisions such that biosolids land application operations would be subject to a thorough review through the

general permitting process or as needed for an individual permit for a particular operation. Also see Master Response 9 and Response to Comment 40-7.

39-8. Dumping sewage sludge into the oceans did not beneficially use the material, nor did it take advantage of the potentially beneficial characteristics of the material. Ocean dumping was adversely affecting marine environments, primarily by depleting oxygen supplies and physically covering organisms. Using biosolids as a soil amendment or fertilizer has been practiced for decades without evidence of significant adverse effects. The Antelope Valley agricultural operations are not significantly different from many agricultural operations throughout the state. See Response to Comment 33-2.